

# PUBLIC SUBMISSION

**As of:** 4/14/20 1:19 PM  
**Received:** April 13, 2020  
**Status:** Draft  
**Tracking No.** 1k4-9g43-skqo  
**Comments Due:** April 13, 2020  
**Submission Type:** Web

**Docket:** EPA-R04-OW-2020-0056

Ocean Dumping: Modification of an Ocean Dredged Material Disposal Site Offshore of Port Everglades, Florida

**Comment On:** EPA-R04-OW-2020-0056-0001

Ocean Dumping: Modification of an Ocean Dredged Material Disposal Site Offshore of Port Everglades, FL

**Document:** EPA-R04-OW-2020-0056-DRAFT-0022

Comment on EPA-R04-OW-2020-0056-0001

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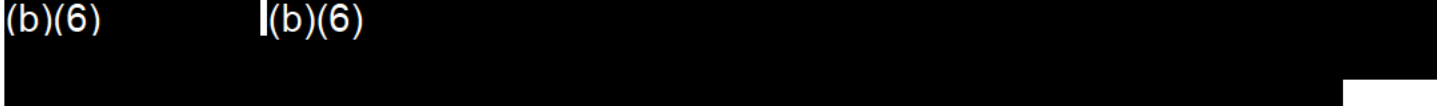
## Submitter Information

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### General Comment

The EPA should not approve this modification because it has utterly failed to consider the substantial likelihood of detrimental environmental impacts that will result from an expansion of the Port Everglades ODMDS. Despite having ample evidence of the disastrous environmental effects on the endangered Staghorn coral in the Florida Reef caused by the dredging of the PortMiami channel, the EPA has chosen to rely on the very same flawed environmental assessment data that it relied on during the approval process for the PortMiami expansion to assert that damage caused by the current Port Everglades expansion will be within permitted limits. Not only does the EPA rely on the same 2010 assessments found to be incorrect by the National Oceanic and Atmospheric Administration, the Florida Department of Environmental Protection, the University of Miami, and Miami Waterkeeper, but it relies on assessments obtained under former U.S. Army Corps. of Engineers lead biologist

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The Port Everglades ODMDS sits adjacent to the only inshore barrier reef in the continental U.S., which is home to seven species of Endangered Species Act-listed corals. This proposed expansion will directly threaten six of these species of coral which comprise the reef that currently provides about \$657 million in protection annually between Fort Lauderdale and Miami, a number which drastically increases during severe storm events. In its current proposed modification, the EPA has failed to address the fact that the 2014 dredging of PortMiami by the Corps led to the killing of over 500,000 corals, that disturbed sediment from the dredging traveled 550 meters farther than predicted, that coral colonies in the indirect impact area were underestimated by as much as 10 times, that 95% of the reef initially surveyed is no longer inhabitable for coral, and that all of the under-counting, underestimates and misstatements were made under the leadership of a Corps biologist who was later convicted for lying about working with a South Florida dredging consulting firm at the same time she was working with the Corps and overseeing these two disastrous projects.

The EPA decision to approve this modification would be arbitrary and capricious and unlikely to survive review, however the damage done to the Florida Reef will be permanent. I therefore implore the EPA to properly consider the feasible alternatives and deny this modification.